

REMARKS

The Office Action dated February 8, 2006, has been received and carefully considered. In this response, claims 1, 15 and 21 have been amended, claim 28 has been added, and claim 22 has been cancelled without prejudice. Entry of the amendments to the claims 1, 15 and 21, the addition of claim 28, and the cancellation of claim 22 without prejudice is respectfully requested. Reconsideration of the outstanding objections/rejections in the present application is also respectfully requested based on the following remarks.

I. THE OBJECTION TO CLAIM 23

On page 2 of the Office Action, claim 23 was objected to because a claim, which depends from a dependent claim, should not be separated by any claim which does not also depend from said dependent claim.

Applicant has deleted claim 22 and added new dependent claim 28 which recites the same recitation as old claim 22. Accordingly, Applicant respectfully submits that claim 23 properly depends from claim 20.

In view of the foregoing, it is respectfully requested that the aforementioned objection to claim 23 be withdrawn.

II. THE ANTICIPATION REJECTION OF CLAIMS 15-16 AND 19-26

On page 3 of the Office Action, claims 15-16 and 19-26 were rejected under 35 U.S.C. § 102(e) as being anticipated by Cullen (U.S. Patent No. 6,272,528). This rejection is hereby respectfully traversed.

Under 35 U.S.C. § 102, the Patent Office bears the burden of presenting at least a prima facie case of anticipation. In re Sun, 31 USPQ2d 1451, 1453 (Fed. Cir. 1993) (unpublished). Anticipation requires that a prior art reference disclose, either expressly or under the principles of inherency, each and every element of the claimed invention. Id. "In addition, the prior art reference must be enabling." Akzo N.V. v. U.S. International Trade Commission, 808 F.2d 1471, 1479, 1 USPQ2d 1241, 1245 (Fed. Cir. 1986), cert. denied, 482 U.S. 909 (1987). That is, the prior art reference must sufficiently describe the claimed invention so as to have placed the public in possession of it. In re Donohue, 766 F.2d 531, 533, 226 USPQ 619, 621 (Fed. Cir. 1985). Such possession is effected only if one of ordinary skill in the art could have combined the disclosure in the prior art reference with his/her own knowledge to make the claimed invention. Id.

Regarding claim 15, the Examiner asserts that Cullen teaches a method for personalizing delivery of insurance or financial services-related content to a user, comprising the steps of: determining information about the user using a filter module associated with an engine (Cullen; col. 1, lines 31-45, col. 3, lines 29-34, and col. 5, lines 55-67), the engine being accessible by the user over a communications network (Cullen; Abstract, col. 3, lines 2-9, and col. 4, lines 1-35); personalizing the insurance or financial services-related content based on the information about the user (Cullen; col. 1, lines 61-67, col. 6, lines 9-21, and col. 7, lines 16-67); and delivering the insurance or financial services-related content to the user (Cullen; col. 1, lines 61-67, col. 6, lines 9-21).

Although Applicant does not agree with the pending rejection, Applicant has nonetheless amended the claims to clarify the claimed systems and methods and better distinguish the cited references. In particular, Applicant has amended each of independent claims 15 to recite

“determining information about the user based on the user’s historical access pattern to particular insurance products or policies using a filter module associated with an engine, the engine being accessible by the user over a communications network.” Independent claims 1 and 21 have been amended in similar fashion.

Applicant respectfully submits that Cullen does not teach or suggest any feature or functionality that even remotely comprises the step of “determining information about the user based on the user’s historical access pattern to particular insurance products or policies using a filter module associated with an engine, the engine being accessible by the user over a communications network,” as expressly recited in claim 15. Thus, Applicant respectfully submits that claim 15 is allowable over the cited references for at least this reason. Applicant further respectfully submits that claims 1 and 21 are allowable for at least this reason.

Regarding claims 2-14, 16-20 and 22-28, these claims are dependent upon independent claim 1, 15 or 21. Thus, since independent claims 1, 15 and 21 should be allowable as discussed above, claims 2-14, 16-20 and 22-28 should also be allowable at least by virtue of their dependency on independent claim 1, 15 or 21. Moreover, these claims recite additional features which are not disclosed, or even suggested, by the cited references taken either alone or in combination. For example, claim 9 recites “wherein the information about the user and the insurance or financial services-related content are stored in a database.” Applicant respectfully submits that the cited references – alone or in combination – teach or suggest the method of claim 1 wherein the information about the user and the insurance or financial services-related content are stored in a database.

In view of the foregoing, it is respectfully requested that the aforementioned anticipation rejection of claims 15-16 and 19-26 be withdrawn.

III. THE OBVIOUSNESS REJECTION OF CLAIMS 1-14 AND 17-18, 27

On page 6 of the Office Action, claims 1-2, 4, 9-14 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cullen in view of Hsu (U.S. Publication No. 2006/0020530). On page 11 of the Office Action, claims 17 and 27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cullen in view of Quido (U.S. Publication No. 2003/0093302). On page 12 of the Office Action, claims 3 and 5-7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cullen in view of Quido. On page 14 of the Office Action, claim 8 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Cullen in view of Hsu, further in view of Parker (U.S. Publication No. 2003/0182290). These rejections are hereby respectfully traversed.

As stated in MPEP § 2143, to establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Applicant respectfully submits that the obviousness of claims 1-14, 17-18, and 27 has been overcome by the amendments and remarks set forth above in connection with the anticipation rejection of claims 15-16 and 19-26.

In view of the foregoing, it is respectfully requested that the aforementioned obviousness rejection of claims 1-14 and 17-18, 27 be withdrawn.

IV. CONCLUSION

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.


To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made.

Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0206, and please credit any excess fees to the same deposit account.

Respectfully submitted,

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APPENDIX A

1. (Currently Amended) A system for personalizing and delivering insurance or financial services-related content to a user, comprising:

a filtering module associated with an engine for determining information about the user based on the user's historical access pattern to particular insurance products or policies, and for personalizing and delivering the insurance or financial services-related content based on the information about the user, the engine being accessible to the user over a communications network; and

an administration module associated with the engine for inputting, updating and accessing information about the user and the insurance or financial services-related content available to the user, the administration module being accessible to an administrator of the system via an administration interface.

2. (Original) The system of claim 1 wherein the insurance or financial services-related content is delivered to the user over the communications network.

3. (Original) The system of claim 2 wherein the insurance or financial services-related content is delivered in PDF format.

4. (Original) The system of claim 2 wherein the insurance or financial services-related content delivered to the user is located at a URL address.

5. (Original) The system of claim 1 wherein the insurance or financial services-related content is delivered to the user via mail delivery means.

6. (Original) The system of claim 5 wherein the mail delivery means comprises the United States Postal Service.

7. (Original) The system of claim 5 wherein the mail delivery means comprises express delivery service.

8. (Original) The system of claim 1 wherein the administration interface further comprises scanning means for uploading insurance or financial services-related information.

9. (Original) The system of claim 1 wherein the information about the user and the insurance or financial services-related content are stored in a database.

10. (Original) The system of claim 1 wherein the information about the user comprises the user's identity.

11. (Original) The system of claim 1 wherein the information about the user comprises log-in information such as user name and password.

12. (Original) The system of claim 1 wherein the insurance or financial services-related content comprises information about insurance products and services available to the user.

13. (Original) The system of claim 1 wherein the insurance or financial services-related content comprises literature about insurance products and services available to the user.

14. (Original) The system of claim 1 wherein the communications network comprises the Internet.

15. (Currently Amended) A method for personalizing delivery of insurance or financial services-related content to a user, comprising the steps of:

determining information about the user based on the user's historical access pattern to particular insurance products or policies using a filter module associated with an engine, the engine being accessible by the user over a communications network;

personalizing the insurance or financial services-related content based on the information about the user; and

delivering the insurance or financial services-related content to the user.

16. (Original) The method of claim 15 wherein the insurance or financial services-related content is delivered to the user over the communications network.

17. (Original) The method of claim 15 wherein the insurance or financial services-related content is delivered to the user via mail delivery means.

18. (Original) The method of claim 15 wherein delivering the insurance or financial services-related content comprises transferring the user to a URL address containing the insurance or financial services-related content.

19. (Original) The method of claim 15 wherein the information about the user comprises the user's identity.

20. (Original) The method of claim 19 wherein the user's identity is automatically determined upon the user accessing the filter module.

21. (Original) The method of claim 19 where the user's identity is determined based on the user's username and password.

22. (Canceled).

23. (Original) The method of claim 20 wherein the insurance or financial services-related content comprises literature relating to products and services available to the user.

24. (Original) The method of claim 20 wherein the information about the user is stored in a database.

25. (Currently Amended) A method for a user to obtain personalized insurance or financial services-related content, comprising:

accessing a filter module associated with an engine for determining information about the user based on the user's historical access pattern to particular insurance products or policies, and for personalizing the insurance or financial services-related content based on information about the user, the engine being accessible to the user of a communications network; and

receiving the insurance or financial services-related content.

26. (Original) The method of claim 25 wherein the insurance or financial services-related content is received over the communications network.

27. (Original) The method of claim 25 wherein the insurance or financial services-related content is received via mail delivery means.

28. (New) The method of claim 15 wherein the insurance or financial services-related content comprises information about insurance products and services available to the user.